

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Joseph Sabella,  
Petitioner,

vs

Criminal No: 1:18-cr-00015-AKH-3

United States of America,  
Respondents

*The Government has until  
May 22, 2020 to respond.  
A hearing shall take  
place shortly after.*

*Al 14. 5-14-2020*

**MOTION FOR REDUCTION OF SENTENCE AND/OR  
COMPASSIONATE RELEASE PURSUANT TO 18 USC § 3582(c) (1) (B)**

COMES NOW, Joseph Sabella, hereinafter known as petitioner, in pro se forma, respectfully submits the above motion for Reduction of Sentence and/or Compassionate Release under 18 USC 3582 (c)(1)(B) after Congress passed the First Step Act (2018) and the recently enacted Cares Act (2020). Petitioner has currently served almost **one (1)** year of his current sentence. Further, petitioner projected release date is October 23, 2025. In support thereof petitioner avers as follows:

1- On February 12, 2019, the defendant pleaded guilty, pursuant to the Plea Agreement, to conspiracy to commit racketeering, in violation of Title 18, United States Code, Section 1962(d). (PSR ¶ 12). After grouping the offense levels of each Group pursuant to